

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

THIS DOCUMENT RELATES TO:

City of Rochester v. Purdue Pharma, L.P.,
No. 19-op-45853 (Track 12)

Lincoln County v. Richard Sackler, M.D., No.
20-op-45069 (Track 13)

City of Independence, Missouri v. Williams,
No. 1:19-op-45371

County of Webb v. Purdue Pharma, L.P., No.
18-op-45175 (Track 15)

MDL 2804
Case No. 1:17-md-2804

Judge Dan Aaron Polster

**JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER
REGARDING IDENTITIES OF MEMBERS OF EXPRESS SCRIPTS'
PHARMACY AND THERAPEUTICS COMMITTEE**

The Plaintiffs' Executive Committee in MDL 2804 (the "PEC") and the Express Scripts Defendants ("Express Scripts"), having agreed that Express Scripts will provide certain discovery about Express Scripts' Pharmacy & Therapeutics ("P&T") Committee and having agreed to procedures and other matters relative to same, hereby jointly move the Court to enter the proposed PROTECTIVE ORDER REGARDING IDENTITIES OF MEMBERS OF EXPRESS SCRIPTS' PHARMACY AND THERAPEUTICS COMMITTEE, submitted as Exhibit A hereto.

WHEREFORE, the PEC and Express Scripts jointly and respectfully request that the Court enter the proposed PROTECTIVE ORDER REGARDING IDENTITIES OF MEMBERS OF EXPRESS SCRIPTS' PHARMACY AND THERAPEUTICS COMMITTEE submitted herewith.

Date: April 29, 2024

Respectfully submitted,

/s/ Jonathan G. Cooper

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